

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION

**ROY HOLMES, TINA ALEXANDER,  
PATRICK NORRIS, and MELISSA GARNER,  
Each Individually and on Behalf of  
All Others Similarly Situated**

**PLAINTIFFS**

vs. Case No. 4:20-cv-191-DPM

**STETSON COURIER, INC.  
and JOHN STETSON**

**DEFENDANTS**

**PLAINTIFFS' MOTION TO SUSPEND THE POST-JUDGMENT DISCOVERY DEADLINE**

Plaintiffs Roy Holmes, Tina Alexander, Patrick Norris, and Melissa Garner, by and through their attorneys of the Sanford Law Firm, PLLC, for their Motion to Suspend the Post-Judgment Discovery Deadline, state as follows:

1. On 1 May 2024, Plaintiffs filed a Motion to Reopen Discovery, requesting leave to conduct post-judgment discovery in order to proceed with collection efforts against Defendants. ECF No. 166. This Court granted the Motion on 22 May 2024. ECF No. 167.

2. On 23 August 2024, Plaintiffs filed a Motion for Extension of Time to Complete Discovery and Compel Deposition Appearance. ECF. 171. The Court granted that Motion and extended the post-judgment discovery deadline to 20 December 2024. The Court also ordered Defendant John Stetson to appear for 18 October 2024. ECF No. 174.

3. Despite this Court's unequivocal directive, Mr. Stetson failed to appear for his deposition. Plaintiffs thereafter filed a Motion for Sanctions and Request for Writ of Body Attachment on 8 November 2024. ECF No. 179. That Motion remains pending before the Court.

4. The resolution of Plaintiffs' Motion for Sanctions is a critical inflection point for this litigation, as it will directly impact both Mr. Stetson's engagement with these proceedings and Plaintiffs' ability to conduct meaningful discovery. Without clarity on Mr. Stetson's compliance—or lack thereof—any further discovery efforts are likely to be inefficient and potentially futile.

5. To date, Plaintiffs have diligently pursued discovery within the parameters set by the Court, but the procedural posture of this case has reached a juncture where adhering to a fixed discovery deadline is impractical. Rather than requesting successive extensions of time, Plaintiffs submit that judicial economy and the orderly administration of justice would be best served by suspending the discovery deadline until such time as the Court resolves the pending Motion for Sanctions and the issues surrounding Mr. Stetson's compliance.

6. A suspension of the discovery deadline will allow the parties—and the Court—to proceed with clarity and purpose once the threshold issues of Mr. Stetson's compliance are resolved. Moreover, this approach avoids unnecessary motion practice and ensures that Plaintiffs' post-judgment collection efforts are not prejudiced by deadlines that may ultimately need further adjustment.

7. This extension will not cause undue delay or prejudice any party.

8. Counsel for Plaintiffs has conferred with counsel for Defendant Stetson Courier, Inc., regarding its stance as to this Motion and counsel for Defendant Stetson Courier, Inc. represented that he is unable to discern Defendant Stetson Courier, Inc.'s position with respect to the requested suspension of the post-judgment discovery deadline due his inability to contact Mr. Stetson, as stated in the Renewed Motion to Withdraw as Counsel and subsequent Status Report.

9. Defendant John Stetson is now *pro se* and has failed to engage with Plaintiffs' discovery requests or his previous counsel. See Renewed Motion to Withdraw as Counsel, ECF 168. Therefore, Plaintiffs assume his position is **Opposed**.

WHEREFORE, Plaintiffs respectfully request that the Court suspend the current discovery deadline until the resolution of Plaintiffs' pending Motion for Sanctions (ECF No. 179) and any related compliance issues concerning Defendant John Stetson.

Respectfully submitted,

**ROY HOLMES, TINA ALEXANDER,  
PATRICK NORRIS and MELISSA  
GARNER, PLAINTIFFS**

SANFORD LAW FIRM, PLLC  
Kirkpatrick Plaza  
10800 Financial Centre Pkwy, Suite 510  
Little Rock, Arkansas 72211  
Telephone: (800) 615-4946  
Facsimile: (888) 787-2040

Josh Sanford  
Ark. Bar No. 2001037  
josh@sanfordlawfirm.com